

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

VS.

SAMANTHA SANDERS

§
§
§
§
§

CRIMINAL NO. H-19-CR-459

CRIMINAL INFORMATION

The United States Attorney charges that:

**COUNT ONE
Conspiracy**

A. OBJECT OF THE CONSPIRACY

On or about August 18, 2018 through August 22, 2018, in the Southern District of Texas, Defendant, SAMANTHA SANDERS, and others known and unknown to the United States, conspired and agreed with each other to recruit, entice, harbor, transport, provide, and obtain by any means minor females knowing or in reckless disregard of the fact that the minor females had not attained the age of 18 years and would be caused to engage in commercial sex acts, in violation of Title 18, United States Code, Section 1591(a) and (b).

**B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
ACCOMPLISHED**

The object of the conspiracy was to be accomplished, in substance, as follows:

1. SANDERS provided the minor females with transportation to locations where the minor females would engage in commercial sex.
2. SANDERS instructed the minor females what to charge for the commercial sex acts.
3. SANDERS collected the money from the minor females earned performing

commercial sex acts.

4. SANDERS supplied the minor females with items needed to perform commercial sex acts such as condoms and clothing.

C. OVERT ACTS

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, Defendant SANDERS, and others known and unknown to the United States, committed various overt acts within the Southern District of Texas, including but not limited to:

1. On or between August 18, 2018 and August 22, 2018, SANDERS provided MV1, MV2 and MV3 transportation to and from locations where they would be caused to engage in commercial sex.
2. Between August 18, 2018 and August 22, 2018, SANDERS provided minor female victims MV1, MV2 and MV3 of the conspiracy with food, condoms and other necessary items for conducting commercial sex acts.

All in violation of Title 18, United States Code, Section 371.

JENNIFER B. LOWERY
United States Attorney

By: _____
Lisa M. Collins
Assistant United States Attorneys